UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS BOSTON DIVISION

BOSTON PARENT COALITION FOR ACADEMIC EXCELLENCE CORP., Plaintiff,

v.

Civil Action No. 1:25-cv-12015

BOSTON SCHOOL COMMITTEE and MARY SKIPPER, in her official capacity as Superintendent of the Boston Public Schools, Defendants.

MOTION FOR ADMISSION PRO HAC VICE OF JOHN R. FOWLER

Pursuant to Local Rule 83.5.3(b) of the United States District Court for the District of Massachusetts, Francisca Fajana, a member in good standing of the Bar of this Court and an attorney of law with LatinoJustice PRLDEF, move for the pro hac vice admission of John R. Fowler ("Applicant"), an attorney with the NAACP Legal Defense & Educational Fund, Inc., 700 14th Street NW, Suite 600, Washington, DC 20005, to appear and practice on behalf of the Proposed Defendant-Intervenors, Boston Education Justice Alliance and Asian Pacific Islanders Civil Action Network, in the above-captioned matter. The undersigned counsel, in support thereof, state the following:

- Applicant is an attorney with the NAACP Legal Defense & Educational Fund, 700 14th Street NW, Suite 600, Washington, DC 20005.
- 2. Applicant is a member of the District of Columbia bar in good standing.
- 3. Applicant is in good standing in every jurisdiction where he has been admitted.
- 4. Applicant is not subject to any disciplinary proceedings as a member of any bar and has not been disciplined in any jurisdiction.

5. Applicant has not previously had a pro hac vice admission to this Court (or other admission

for a limited purpose) revoked for misconduct.

6. Attached as Exhibit 1 is the Certification of John R. Fowler in support of this motion.

7. Applicant has read and is familiar with the Local Rules of the United States District Court

for the District of Massachusetts in compliance with Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully requests that Applicant John R. Fowler be

admitted before this Court pro hac vice for the purpose of appearing as counsel for the above-

mentioned Proposed Defendant-Intervenors in accordance with the Rules of this Court.

Dated: 24th day of November 2025

/s/ Francisca D. Fajana

FRANCISCA D. FAJANA LATINOJUSTICE PRLDEF

BBO # 564301 475 Riverside Drive, Suite 1901

New York, NY 10115

Tel: 212.219.3360

FFajana@latinojustice.org

LOCAL RULE 7.1 CERTIFICATION

Counsel for Proposed Defendant-Intervenors Boston Education Justice Alliance and Asian Pacific Islanders Civil Action Network hereby certifies that they conferred in good faith with counsel for both Plaintiff and Defendants prior to filing this motion and attempted to narrow the issue.

/s/ Francisca D. Fajana
FRANCISCA D. FAJANA
LATINOJUSTICE PRLDEF
BBO # 564301
475 Riverside Drive, Suite 1901
New York, NY 10115
Tel: 212.219.3360
FFajana@latinojustice.org

CERTIFICATE OF SERVICE

I, Francisca D. Fajana, hereby certify that on November 24, 2025, the foregoing document was serviced upon all parties through this Court's CM/ECF filing system.

/s/ Francisca D. Fajana
FRANCISCA D. FAJANA
LATINOJUSTICE PRLDEF
BBO # 564301
475 Riverside Drive, Suite 1901
New York, NY 10115
Tel: 212.219.3360
FFajana@latinojustice.org